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January 29, 2002

Ms. Magalie R. Salas, Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Room TW-A325  
Washington, DC 20554

Re: *In the Matter of Provision of Directory Listing Information Under the Communications Act of 1934, As Amended, The Use of N11 Codes and Other Abbreviated Dialing Arrangements, Administration of the North American Numbering Plan, CC Docket Nos. 99-273, 92-105, 92-237, Notice of Proposed Rulemaking (rel. 1/9/2002) ("Notice")*

**Request for Extension of Comment/Reply Comment Cycle**

Dear Ms. Salas,

Due to the length and complexity of the Notice, and the potential impact of any changes that may result from the proceeding initiated by the Notice, BellSouth respectfully requests that the current proposed comment and reply cycle be extended. BellSouth believes that quality of submissions would be greatly improved if the comment cycle were to be extended from the current date until the 60th day after publication in the Federal Register. Further, because analysis of the comments will be a critical part of this proceeding, BellSouth requests that the date for reply comments be extended from the current day until the 90<sup>th</sup> day after publication.

The Notice of Proposed Rulemaking seeks comment on 128 separate items. There are a number of proposed alternatives to current 411 service that are highly technical in nature, and will require detailed feasibility and cost analysis in order to provide substantive input for the record. The fundamental issue of this proceeding, 411 pre-subscription, is a complex and controversial topic that has generated numerous *ex parte* filings prior to the issuance of the Notice. BellSouth believes the extension it seeks is reasonable in light of the special circumstances of this proceeding, and that it has demonstrated good cause for such an extension.

If you have any questions regarding this matter, please do not hesitate to contact me at (202) 463-4109.

Sincerely,



Mary L. Henze

cc: G. Cooke